

Exhibit C

From: Lai Yip <LYip@sheppardmullin.com>

Sent: Tuesday, July 26, 2022 5:01 PM

To: Jim Vaughn <JVaughn@idsinc.com>; Waqas Anis <wanis@idsinc.com>; Jonathan Karchmer <JKarchmer@idsinc.com>; Daniel Watson <dwatson@idsinc.com>; Nitin Khanna <nkhanna@idsinc.com>; SKYRYSEMOOG.LWTEAM@lw.com; tflynn@harrisbeach.com; truitt.a@wssllp.com; mireles.a@wssllp.com; Cassandra.Baloga@lw.com; Arman.Zahoory@lw.com; green.a@wssllp.com; Kelley.Storey@lw.com

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; James Salem <JSalem@sheppardmullin.com>; msubject@hodgsonruss.com; rfluskey@hodgsonruss.com

Subject: Moog v. Skyryse/Volume Shadow Copies

Jim and Counsel,

Our expert has informed us of an issue. We're informed that Windows laptops, such as certain of the defendants' devices, make and store periodic backups or "snapshots" of themselves called Volume Shadow Copies, but that all of these Volume Shadow Copies contained in the images stored on the VMs are completely zeroed out. The Inspection Protocol, Sections III.A.4 & III.B.1, require the creation and loading-to-the-VMs of an "identical physical forensic bit-stream image[]" of the devices, which would include the Volume Shadow Copies that are stored on the devices.

We understand that each device has numerous Volume Shadow Copies, and that collectively these are voluminous. Although we would be entitled to all Volume Shadow Copies under the Inspection Protocol, to save resources and time we do not necessarily need all of them to be processed and uploaded (although we certainly reserve the right to do so). But certain Volume Shadow Copies are clearly relevant and we absolutely need them. While our expert is still making his way through the devices (and we still do not have access to a number of devices), he has already seen evidence of deletion of Moog files from Misook Kim's Skyryse-issued laptop, E0001. For example, the forensic data shows that on March 2, 2022, Ms. Kim copied approximately 780 files that appear to be Moog files (based on matching files names and file size) from an external device onto E0001, but those files were subsequently deleted. The only way we can potentially see the contents of these files (and, among other things, confirm they were Moog files) is to determine if they might be recoverable from the Volume Shadow Copies.

We request that iDS process and export the following Volume Shadow Copies:

E0001

HarddiskVolumeSnapshot4 (2/14/2022, 20:45:24 UTC)

HarddiskVolumeSnapshot8 (2/17/2022, 22:08:17 UTC)

HarddiskVolumeSnapshot1 (3/2/2022, 23:14:56 UTC)

E0027

HarddiskVolumeSnapshot3 (2/14/2022, 22:55:51 UTC)

HarddiskVolumeSnapshot6 (2/15/2022, 19:05:34 UTC)

HarddiskVolumeSnapshot13 (2/18/2022, 17:08:21 UTC)

As noted above, our experts are still going through the devices and we may ask for Volume Shadow Copies from others of defendants' devices (including those to which we still do not have access), or further Volume Shadow Copies from E0001 and/or E0027.

Counsel for Skyrise, we assume you will want an opportunity to review these Volume Shadow Copies for privilege before they are made available to Moog's reviewers. We presume Skyrise already has these Volume Shadow Copies in its possession and that there should be no delay in commencing this review (i.e., nothing is needed from iDS for Skyrise to commence the privilege review of the above Volume Shadow Copies). We ask that you conduct and complete such review as quickly as possible. Please confirm you will complete such review within two weeks.

Regards,

Lai L. Yip

+1 415-774-3147 | direct

LYip@sheppardmullin.com | [Bio](#)

SheppardMullin

Four Embarcadero Center, 17th Floor

San Francisco, CA 94111-4109

+1 415-434-9100 | main

www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)